

Questions and Answers

Guidelines on Natural, Naturally raised, Feed, Antibiotic and Hormone claims

General

Who do these guidelines apply to?

These guidelines on food labels and in advertising are voluntary. However, once the company chooses to make these claims they are subject to the guidelines.

These guidelines apply to foods sold at all levels of trade, including bulk sale or wholesale foods for further processing, when a company chooses to label or advertise their meat, poultry or fish products with a natural, feed, antibiotic or hormone claim.

When will these guidelines be implemented?

The Canadian Food Inspection Agency (CFIA) has already used these guidelines to provide guidance to industry and other interested stakeholders on the use of method of production claims.

To ensure that these guidelines meet the consumers' expectations, the CFIA will be seeking comments from all stakeholders.

As this guidance has been communicated previously to industry and other stakeholders, this policy is already in effect and claims are currently assessed based on the criteria in the guidelines.

Can other claims be made if a product does not meet the criteria for a natural, naturally raised, feed, antibiotic or hormone claims?

Yes, other appropriate and explicit claims that describe the way in which the animal was fed or raised may be used provided they are truthful and not misleading. These claims should be verifiable and supported with appropriate information.

However, if a company chooses to make natural, naturally raised, feed, antibiotic or hormone claims, it will be the responsibility of that company to provide evidence that demonstrates that their products meet the criteria outlined in the guidelines.

Do claims related to natural, feed, antibiotics or hormones mean the product is organic?

No. These guidelines do not affect organic claims, which are legislated under the Organic Products Regulations. The term natural or other method of production claims does not indicate that the product meets the criteria for organic claims.

Would industry be expected to change the label if ingredient sources changed and the claim criteria could no longer be met?

Yes. Claims regarding how animals are fed and raised are voluntary, however if used, the appropriate criteria must be met. It is the responsibility of the company to decide when and which claims to use, keeping in mind that foods cannot be labelled or advertised in a manner that would mislead or deceive the consumer.

Natural claims

What is considered human influence or intervention with regards to “natural” or “naturally raised” claims?

To be considered “natural” or “naturally raised” animals would not be able to receive vaccinations or medication, which would be difficult to accomplish as standard feed given usually contains vitamins, minerals, additives, medication and direct fed microbials. In addition, animals raised on a farm would not meet the “naturally raised” criteria as this is considered to be a human intervention.

Examples of products that could use “natural” or “naturally raised” claims are wild turkey or wild fish. When a “natural” or “naturally raised” claim cannot be made, industry may use other, more specific claims which convey information on the methods used to raise a particular animal or fish, provided they are truthful and not misleading, such as” grain-fed.”

Feed claims

What are considered grains for the purpose of feed related claims?

Under the Canada Grain Regulations, grains include: barley, beans, buckwheat, canola, chick peas, corn, faba beans, flaxseed, lentils, mixed grain, mustard seed, oats, peas, rapeseed, rye, safflower seed, solin, soybeans, sunflower seed, triticale and wheat. These would all be considered grains for the purpose of feed related claims.

If other feeds, such as hay, are used to feed animals, can they be labelled as “grain-fed”?

No. If animals are fed other feed ingredients, such as hay, the product could not use the “grain-fed” claim. However, these products could use an “X% grain-fed” claim. For example “80% grain-fed” if accurate, would be an acceptable claim to make.

Hormone claims

Can companies label their products as “hormone-free” instead of “raised without hormones”?

No. Products cannot be labelled as “hormone free” as it may mislead consumers to believe that the meat in question does not contain any hormones. All meat, poultry and fish products contain naturally occurring hormones, which makes the claim “hormone-free” inaccurate.

Enforcement

What will the CFIA's enforcement approach be with respect to this policy?

The CFIA enforces the requirements of the *Food and Drugs Act* and the *Consumer Packaging and Labelling Act* in relation to food to protect consumers against product misrepresentation. Consumers expect labelling and advertising information, including claims, to be truthful and not misleading. The CFIA addresses issues on a priority basis and will verify the compliance of these types of claims based on the established criteria. When non-compliance is identified during inspections and when responding to complaints, appropriate action will be taken to promote compliance.

Will industry need to provide specific documentation to demonstrate it meets the criteria?

No. There is no specific documentation required. In keeping with the Agency’s approach to label verification, industry will need to provide evidence to demonstrate that the product meets the criteria set out in this guidance for natural, feed, antibiotic and hormone claims if such claims are used in labelling or advertising.